

OCT 21

*Federal Trade Commission v. FleetCor Technologies, Inc. et al***Defendants' Injunction Hearing Exhibit List**By: 
Kevin E. Williams
Deputy Clerk

Note: Defendants will introduce printed Terms & Conditions where available. Those printed versions have been previously couriered to the FTC.

Exhibit Number	Description
DX001 	Fuelman Website Screenshot describing package
DX002 	Fuelman Deep Saver Fleet Card Website Screenshot
DX003 	List of Card Programs
DX004 	Fuelman Terms & Conditions May 2016 – January 2018
DX005 	Fuelman Terms & Conditions January 2018 – December 2018
DX006 	Fuelman Terms & Conditions November 2019 – December 2019
DX007 	Fuelman Terms & Conditions
DX008 	Mastercard Terms & Conditions December 2014 – December 2015
DX009 	Mastercard Terms & Conditions June 2019 – January 2020
DX010 	Mastercard Terms & Conditions
DX011 	Mastercard Terms & Conditions May 2020 – December 2020
DX012 	Arco Business Solutions Mastercard Terms & Conditions December 2014 – November 2015
DX013 	Arco Business Solutions Terms & Conditions April 2019 – January 2020
DX014 	Arco Business Solutions Mastercard Terms & Conditions May 2020 – December 2020
DX015	Arco Business Solutions Mastercard T&C
DX016	Clean Advantage Card T&C
DX017 	2022 Q2 10-Q,
DX018	Video Sign Up
DX019 	Web Sign Up

DX020	X	Phone Activation IVR
DX021	X	Web Activation
DX022	X	SUI Pop Up EIC
DX023	X	Email EIC
DX024		Deluxe/Remitco
DX025		https://www.fuelman.com/ (shown live)
DX026		https://fleetcardsusa.com/ (shown live)
DX027		Fuelman Deep Saver Fleet Card Website Screenshot
DX028		Fuelman Simple Saver Fleet Card Website Screenshot
DX029	X	Universal Premium Mastercard Website Screenshot
DX030		BP Business Solutions Website Screenshot
DX031		BP Business Solutions Mastercard Website Screenshot
DX032	X	Fleetcards USA Compare Cards Website Screenshot
DX033		Fleetcards USA ARCO Business Solutions Website Screenshot
DX034		Fleetcards USA BP Business Solutions Website Screenshot
DX035		Fleetcards USA Fuelman Clean Advantage Card Website Screenshot
DX036		Fleetcards USA Fuelman Deep Saver Website Screenshot
DX037	X	Fleetcards USA Fuelman Mastercard Website Screenshot
DX038		Fleetcards USA Fuelman Simple Saver Website Screenshot
DX039		Fleetcards USA Universal Premium Mastercard Website Screenshot
DX040		Fuelman Mastercard Website Screenshot
DX041		Fuelman Site Locator Video
DX042		Fuelman Mastercard Site Locator Video
DX043	X	Fuelman Terms & Conditions

DX044	X	Dkt. 163-2, SJ Exhibit; Fuelman Terms & Conditions
DX045	X	Dkt. 162-19, SJ Exhibit; Fuelman Terms & Conditions
DX046	X	Dkt. 163-1, SJ Exhibit; Fuelman Terms & Conditions
DX047	X	FLT_FTCLIT_0782918; Fuelman Terms & Conditions
DX048		List of Questions from the Court
DX049		FMR for Silverback Construction Inc.
DX050	X	FTC Complaint Analysis, October 2020
DX051	X	Letter to BP Business Solutions Customer <i>withdrawn</i>
DX052	X	Letter on Changes to Terms and Conditions
DX053	X	Letter on Changes to Terms and Conditions
DX054	X	Letter on Changes to Terms and Conditions
DX055	X	Letter on Changes to Terms and Conditions
DX056	X	Letter to Customer on Accelerator Rewards program
DX057	X	Letter to SuperFleet Mastercard Customer
DX058	X	Letter to Fuelman Customer
DX059		FTC Press Release: New Data Shows FTC Received 2.8 Million Fraud Reports from Consumers in 2021
DX060		FTC Consumer Sentinel Network Data Book 2021, February 2022

FTC Exhibit List

For Judge	Exhibit No.	Description	Beginning Bates Number	Ending Bates Number
	PX1	Intentionally omitted	n/a	n/a
	PX2	January 2019 FleetCor template letters announcing Accelerator Rewards Program for certain FleetCor Fuel Card products	FLT_FTCLIT_0002405	FLT_FTCLIT_0002420
	PX3	FleetCor template letter announcing Fuelman Fraud Protector	FLT_FTCLIT_0002551	FLT_FTCLIT_0002551
	PX4	January 1, 2020 FleetCor Fuelman Fleet Card Terms and Conditions	FLT_FTCLIT_0833366	FLT_FTCLIT_0833379
X	PX5	Aug. 24, 2020-Aug. 30, 2020 Fuelman Fleet Management Report ("FMR")	FLT_FTCLIT_0835654	FLT_FTCLIT_0835656
X	PX6	Jan. 21, 2021-Feb. 20, 2021 BP FMR	FLT_FTCLIT_0835657	FLT_FTCLIT_0835658
X	PX7	Aug. 17, 2020-Aug. 30, 2020 Fuelman FMR	FLT_FTCLIT_0835659	FLT_FTCLIT_0835667
X	PX8	Jan. 3, 2021-Feb. 2, 2021 Arco FMR	FLT_FTCLIT_0835668	FLT_FTCLIT_0835668
X	PX9	Jan. 25, 2021-Jan. 31, 2021 Universal Advantage FMR	FLT_FTCLIT_0835669	FLT_FTCLIT_0835670
X	PX10	Jan. 16, 2021-Jan. 31, 2021 Universal Advantage FMR	FLT_FTCLIT_0835671	FLT_FTCLIT_0835672
X	PX11	Jan. 16, 2021-Jan. 31, 2021 Universal Advantage FMR	FLT_FTCLIT_0835673	FLT_FTCLIT_0835674
X	PX12	Jan. 1, 2021-Jan. 31, 2021 Comdata FMR	FLT_FTCLIT_0835675	FLT_FTCLIT_0835720
X	PX13	Jan. 16, 2021-Jan. 31, 2021 BP FMR	FLT_FTCLIT_0835721	FLT_FTCLIT_0835722
X	PX14	Jan. 2, 2021-Jan. 16, 2021 Universal Premium Invoice and FMR	FLT_FTCLIT_0835751	FLT_FTCLIT_0835755

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For Judge	Exhibit No.	Description	Beginning Bates Number	Ending Bates Number
X	PX15	Jan. 17, 2021-Feb. 1, 2021 BuilderPro Invoice and FMR	FLT_FTCLIT_0835767	FLT_FTCLIT_0835770
X	PX16	Jan. 26, 2021-Feb. 1, 2021 Universal Premium Invoice and FMR	FLT_FTCLIT_0835771	FLT_FTCLIT_0835775
X	PX17	Defendant FleetCor's Responses and Objections to Plaintiff FTC's Fourth Set of Interrogatories, February 5, 2021	n/a	n/a
X	PX18	Defendant FleetCor's Supplemental Responses to FTC's First Set of Interrogatories, February 11, 2021	n/a	n/a
X	PX19	Aug. 15, 2022 Fuelman Deep Saver webpage screenshot	n/a	n/a
X	PX20	Aug. 16, 2022 Fuelman Deep Saver webpage screenshot	n/a	n/a
X	PX21	Aug. 15, 2022 Fuelman MasterCard webpage screenshot	n/a	n/a
X	PX22	Aug. 16, 2022 Fuelman MasterCard webpage screenshot	n/a	n/a
X	PX23	Aug. 15, 2022 Fuelman Simple Saver webpage screenshot	n/a	n/a
X	PX24	Aug. 16, 2022 Fuelman Simple Saver webpage screenshot	n/a	n/a
X	PX25	March 2021-Present Fuelman Fleet Card Client Agreement	n/a	n/a

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For Judge	Exhibit No.	Description	Beginning Bates Number	Ending Bates Number
X	PX26	Aug. 18, 2022 FleetCardsUSA.com Compare Cards webpage screenshot	n/a	n/a
X	PX27	Aug. 18, 2022 Universal Premium Card webpage screenshot	n/a	n/a
X	PX28	Jan. 15, 2020-Present FleetCor MasterCard Client Agreement	n/a	n/a
X	PX29	Aug. 18, 2022 BP Business Solutions webpage screenshot	n/a	n/a
X	PX30	March 19, 2021-Present BP Business Solutions Fuel and BP Business Solutions Fuel Plus Client Agreement	n/a	n/a
X	PX31	March 19, 2021-Present BP Business Solutions MasterCard Client Agreement	n/a	n/a
X	PX32	Oct. 3, 2021-Oct. 3, 2022 FleetCor Sentinel Complaints	n/a	n/a
X	PX33	Oct. 3, 2021-Oct. 3, 2022 Comdata Sentinel Complaints	n/a	n/a
X	PX34	Oct. 4, 2021-Oct. 4, 2022 Fuelman Sentinel Complaints	n/a	n/a
X	PX35	Oct. 4, 2022 Fuelman Deep Saver webpage video capture	n/a	n/a
X	PX36	Oct. 5, 2022 Fuelman MasterCard webpage video capture	n/a	n/a
X	PX37	Oct. 12, 2022 FleetCor.com webpage screenshot	n/a	n/a

X PX32A

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For Judge	Exhibit No.	Description	Beginning Bates Number	Ending Bates Number
X	PX38	Oct. 12, 2022 FleetCor.com Company webpage screenshot	n/a	n/a
X	PX39	Oct. 12, 2022 FleetCor.com E-payables webpage screenshot	n/a	n/a
X	PX40	Oct. 25, 2021 email, From: reports@fleetdetails.com, To: NXX CORP DNA AMBU-TRANS, Subject: Fuelman Fleet Card Statement and Report(s) and attachment	n/a	n/a
X	PX41	Oct. 11, 2021-Oct. 24, 2021 Fuelman Fleet Management Report for NXX Corp DBA Ambu-Trans I	n/a	n/a
	PX42	Nov. 16, 2021 email chain, From: customercare@fleetcor.com, To: nxknyc@gmail.com, Subject: Level 2 Pricing	n/a	n/a
X	PX43	Dec. 6, 2021 Fuelman Invoice for NXX Corp DNA Ambu-Trans and corresponding FMR; Dec. 20, 2021 Fuelman Invoice for NXX Corp DNA Ambu-Trans and corresponding FMR; Jan. 3, 2022 Fuelman Invoice for NXX Corp DNA Ambu-Trans and corresponding FMR	n/a	n/a

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For Judge	Exhibit No.	Description	Beginning Bates Number	Ending Bates Number
	PX44	June 15, 2022 email chain, From: Neal Kalish, To: Liz Hayward, Subject: Fuelman Final Notice for Account [redacted]602	n/a	n/a
X	PX45	Aug. 19, 2022 email chain, From: Kristy Alicia, To: nxknyc@gmail.com, Subject: RE: FUELMAN PROPRIETARY - DM vs NXK Corp DNA Ambu-Trans Case [redacted] and attachments	n/a	n/a
X	PX46	March 2021-Present Fuelman Fleet Card Client Agreement	n/a	n/a
X	PX47	Fuelman MasterCard online application	n/a	n/a
X	PX48	FleetCor phone account activation decision tree	n/a	n/a
X	PX49	FleetCor online account activation	n/a	n/a
X	PX50	BP updated Terms and Conditions email	n/a	n/a
X	PX51	Fuelman updated Terms and Conditions pop-up box	n/a	n/a
	PX52	Mar. 13, 2020 Fuelman Fleet Card Client Agreement	FLT_FTCLIT_0004877	FLT_FTCLIT_0004892
	PX53	Mar. 13, 2020 Fuelman Fleet Card Client Agreement	FLT_FTCLIT_0006534	FLT_FTCLIT_0006546
	PX54	Mar. 13, 2020 Fuelman Fleet Card Client Agreement	FLT_FTCLIT_0006670	FLT_FTCLIT_0006686

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For Judge	Exhibit No.	Description	Beginning Bates Number	Ending Bates Number
	PX55	Mar. 13, 2020 Fuelman Fleet Card Client Agreement	FLT_FTCLIT_0006687	FLT_FTCLIT_0006699
	PX56	Mar. 13, 2020 FleetCor MasterCard Client Agreement	FLT_FTCLIT_0007246	FLT_FTCLIT_0007260
	PX57	Mar. 13, 2020 FleetCor MasterCard Client Agreement	FLT_FTCLIT_0008727	FLT_FTCLIT_0008738
	PX58	Mar. 13, 2020 FleetCor MasterCard Client Agreement	FLT_FTCLIT_0008865	FLT_FTCLIT_0008879
	PX59	Mar. 13, 2020 FleetCor MasterCard Client Agreement	FLT_FTCLIT_0008908	FLT_FTCLIT_0008922
	PX286	FleetCor/Comdata Customer Complaints Management Policy, Version 2	Regions_05.13.2020-FTCSubpoena_000008876	Regions_05.13.2020-FTCSubpoena_000008881
	PX297	February 26, 2020 email chain, From: Alan Christian, To: Edward D. Cotter, Subject: RE: RE: [Confidential] Compliance Compliance Management System Document, and attachment	Regions_05.13.2020-FTCSubpoena_000013209 Regions_05.13.2020-FTCSubpoena_000013212	Regions_05.13.2020-FTCSubpoena_000013211 Regions_05.13.2020-FTCSubpoena_000013279
	PX301	April 30, 2020 email chain, From: Erica Clopton, To: Erica Clopton, Subject: FW: FW: Final E&Y Reports, and attachments	Regions_05.13.2020-FTCSubpoena_000031506 Regions_05.13.2020-FTCSubpoena_000031508 Regions_05.13.2020-FTCSubpoena_000031544	Regions_05.13.2020-FTCSubpoena_000031507 Regions_05.13.2020-FTCSubpoena_000031543 Regions_05.13.2020-FTCSubpoena_000031599

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For Judge	Exhibit No.	Description	Beginning Bates Number	Ending Bates Number
	PX347	May 21, 2015 email, From: Morgan Randy, To: Ashley Thekkekara, et al, Subject: RE: Comdata ACH	FLT_FTC00079657	FLT_FTC00079658
	PX355	August 4, 2015 email chain, From: Terry Jaillet, To: Ashley Thekkekara, et al., Subject: RE: NAT late fees	FLT_FTC00310336	FLT_FTC00310338
	PX386	March 22, 2016 email chain, From: Beth Cobb, To: David Maxsimic, Subject: RE: BP PLCC HRCF wave1 implemented	FLT_FTC00120680	FLT_FTC00120682
	PX471	June 16, 2017 email chain, From: Ashley Thekkekara, To: Mary Ann Young, et al., Subject: Discuss policy being used by CSR's to decide on fee waivers	FLT_FTC00120590	FLT_FTC00120592
X	PX609	February 28, 2018 FleetCor Response to CID	n/a	n/a
	PX611	January 12, 2021 FTC's Notice of Deposition of Defendant FleetCor Technologies, Inc. Pursuant to Rule 30(b)(6)	n/a	n/a
	SJ 17	PowerPoint presentation, titled "Voice of Customer - Fuelman" prepared by Hanover Research	HRC000283	HRC000283


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For Judge	Exhibit No.	Description	Beginning Bates Number	Ending Bates Number
	SJ 37	June 13, 2019, From: Chad McCloud, To: Bill Jagrowski, Subject: Fw: Pre-read: Jabian Attrition MTG; July 2016, PowerPoint presentation, titled "Analysis of Customer Attrition: Jabian Consulting's Analysis for the NAFC Business Unit" prepared by Jabian LLC	JABIAN – CONFIDENTIAL 000005	JABIAN – CONFIDENTIAL 000006
	SJ 61	February 16, 2021, Declaration of Joel Fasnacht	n/a	n/a
	SJ 63	July 25, 2017 email chain, From: Greg Secord, To: ssecord@comdata.com, Subject: FW: Cust Sat interviews, and attachment	FLT_FTC00121177 FLT_FTC00121178	FLT_FTC00121177 FLT_FTC00121178
	SJ 90	August 18, 2017 email chain, From: Todd Sale, To: Netcha Rodriguez, et al., Subject: FW: Review Q2 NAL Survey Results, and attachment	FLT_FTC00133457 FLT_FTC00133459	FLT_FTC00133458 FLT_FTC00133459
X	SJ 120	March 13, 2015 email chain, From: Yue Chen, To: Terry Jaillet, et al., Subject: RE: Terms change letter, and attachments	FLT_FTC00114081 FLT_FTC00114083 FLT_FTC00114084	FLT_FTC00114082 FLT_FTC00114083 FLT_FTC00114084
	SJ 124	May 2, 2016 email chain, From: Beth Cobb, To: Ami Layton, et al., Subject: RE: ARCO PLCC HRCF wave 1 implementation	FLT_FTC00080020	FLT_FTC00080025


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For Judge	Exhibit No.	Description	Beginning Bates Number	Ending Bates Number
	SJ 127	October 25, 2017 email chain, From: Yue Chen, To: Ashley Thekkekara, et al., Subject: NEED INPUT - Initiatives Plan, and attachment	FLT_FTC00314844 FLT_FTC00314847	FLT_FTC00314844 FLT_FTC00314847
	SJ 129	March 19, 2016 email, From: Todd Sale, To: Randall Hon, et al., Subject: BP High risk Credit fee, and attachments	FLT_FTC00121179 FLT_FTC00121180 FLT_FTC00121181	FLT_FTC00121179 FLT_FTC00121180 FLT_FTC00121182
	SJ 130	December 22, 2015 email, From: Yue Chen, To: Vamsee Puli, Subject: FW: BP Initiatives - PLCC HRCF Population and Implementation strategy	FLT_FTC00081127	FLT_FTC00081128
	SJ 131	July 13, 2017 email chain, From: Randall Hon, To: Todd Sale, Subject: Re: Late fee waivers on Austin (LIC ID 99260)	FLT_FTC00228335	FLT_FTC00228336
	SJ 132	July 14, 2017 email chain, From: Mark Roberts, To: Todd Sale, et al., Subject: RE: Late fee waivers on Austin (LC ID 99260)	FLT_FTC00228289	FLT_FTC00228291
	SJ 154	August 8, 2017 email chain, From: Yue Chen, To: Ron Clarke, et al., Subject: RE: Mastercard story, and attachment	FLT_FTC00081285 FLT_FTC00081287	FLT_FTC00081286 FLT_FTC00081287
	SJ 173	November 29, 2017 email, From: Ashley Thekkekara, To: Ron Clarke, et al., Subject: NAL budget follow ups, and attachment	FLT_FTC00310504 FLT_FTC00310505	FLT_FTC00310504 FLT_FTC00310505

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For Judge	Exhibit No.	Description	Beginning Bates Number	Ending Bates Number
	SJ 175	December 7, 2017 email chain, From: Greg Secord, To: Paul Baran, Subject: FW: NAT late fees, and attachment	FLT_FTC00311437 FLT_FTC00311439	FLT_FTC00311438 FLT_FTC00311446
	SJ 189	Aug. 12, 2019 email chain, From: Ravi Gupta, To: Yue Chen, Subject: FW: Learnings from North Highland Retention Study, and attachment	FLT_FTCLIT_0814941 FLT_FTCLIT_0814942	FLT_FTCLIT_0814941 FLT_FTCLIT_0814942
	SJ 204	July 2016 Hanover Research Powerpoint presentation "CUSTOMER ATTRITION SURVEY"	FLT_FTCLIT_0769543	FLT_FTCLIT_0769570
	SJ 205	Feb. 27, 2020 email chain, From: Ed Thomas, To: Alexey Gavrilanya, et al, Subject: RE: Small Fleet Early Attrition Initiative discussion with Alexey, and attachment	FLT_FTCLIT_0825597 FLT_FTCLIT_0825603	FLT_FTCLIT_0825601 FLT_FTCLIT_0825603
	SJ 217	Powerpoint presentation "Customer Survey Analysis"	FLT_FTCLIT_0769157	FLT_FTCLIT_0769157
	 SJ 232	Feb. 12, 2020 email chain, From: Ashley Thekkekkara, To: Kyle Dudak, et al, Subject: RE: Ts&Cs-Training doc _ improvements on FQA section	FLT_FTCLIT_0824914	FLT_FTCLIT_0824915
	SJ 240	Nov. 18. 2017 email chain, From: Mary Rachide, To: Eric Dey, et al, Subject: RE: Bill Pay Vendor Review & Down-Select Meeting (11/15): MINUTES, and attachment	FLT_FTCLIT_0798301 FLT_FTCLIT_0798306	FLT_FTCLIT_0798305 FLT_FTCLIT_0798306

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For Judge	Exhibit No.	Description	Beginning Bates Number	Ending Bates Number
	SJ 241	Nov. 18. 2017 email chain, From: Mary Rachide, To: David Maxsimic, et al, Subject: FW: Bill Pay Vendor Review & Down-Select Meeting (11/15): MINUTES, and attachment	FLT_FTCLIT_0798307 FLT_FTCLIT_0798312	FLT_FTCLIT_0798311 FLT_FTCLIT_0798312
	SJ 242	Nov. 19. 2017 email chain, From: David Maxsimic, To: Mary Rachide, et al, Subject: RE: Bill Pay Vendor Review & Down-Select Meeting (11/15): MINUTES	FLT_FTCLIT_0798325	FLT_FTCLIT_0798331
	SJ 244	Aug. 24, 2018 email chain, From: Ashley Thekkekkara, To: Kaushik Ramakrishna, et al, Subject: FW: Quickdata email stabilization	FLT_FTCLIT_0806174	FLT_FTCLIT_0806175
	SJ 254	Oct. 3, 2019 email chain, From: Ashley Thekkekkara, To: Todd Sale, Subject: FW: Potential 2020 Quality Products, and attachment	FLT_FTCLIT_0818077 FLT_FTCLIT_0818078	FLT_FTCLIT_0818077 FLT_FTCLIT_0818078
	SJ 255	Aug. 12, 2019 email chain, From: Rahul Vora, To: David Krantz, et al, Subject: RE: Sr. Staff Meeting Agenda, and attachment	FLT_FTCLIT_0814929 FLT_FTCLIT_0814937	FLT_FTCLIT_0814936 FLT_FTCLIT_0814937
	SJ 259	Aug. 23, 2018 email chain, From: Yue Chen, To: Revenue Team, Subject: FW: NA Fuel Pre-Budget Meeting, and attachments	FLT_FTCLIT_0806021 FLT_FTCLIT_0806022 FLT_FTCLIT_0806054	FLT_FTCLIT_0806021 FLT_FTCLIT_0806053 FLT_FTCLIT_0806111

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For Judge	Exhibit No.	Description	Beginning Bates Number	Ending Bates Number
	SJ 260	June 18, 2018 email chain, From: Yvette Chen, To: Vamsee Puli, Subject: FW: A couple things, and attachments	FLT_FTCLIT_0803679 FLT_FTCLIT_0803681 FLT_FTCLIT_0803682	FLT_FTCLIT_0803680 FLT_FTCLIT_0803681 FLT_FTCLIT_0803686
	SJ 266	March 25, 2016 email chain, From: Yue Chen, To: Jeanne Revoir, Subject: FW: BP PLCC HRCF wave1 implemented	FLT_FTC00126131	FLT_FTC00126135

